

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

SHAUN STRICKLAND,

Plaintiff,

v.

DELAWARE COUNTY, et al.,

Defendants.

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Civil Action No: 21-4141

Judge Michael M. Baylson

**STIPULATION FOR EXTENSION OF TIME**  
**PURSUANT TO LOCAL RULE 7.4(b)(2)**

Pursuant to Local Rule 7.4(b)(2), Plaintiff Shaun Strickland and Defendants Delaware County, Lee Tatum, GEO Group Inc., Kristen Grady, John Christakis, Ronald Phillips, and Jeff Withelder, hereby stipulate as follows:

1. The parties continue to engage in discussions regarding the exchange of written discovery.
2. The parties held a phone conference on this subject on October 19 and will continue exchanging written discovery throughout the month of October and early November.
3. Therefore, Plaintiff Strickland and Defendants Delaware County, Tatum, GEO Group, Grady, Christakis, Phillips, and Withelder agree that the following deadline is to be amended as follows:
  - a. The parties may file a motion to compel regarding Rule 33 and 34 by November 18, 2022.

So stipulated,

/s/ Sarah Bleiberg Bellos

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Dated: October 27, 2022

**APPROVED BY THE COURT:**

/s/ MICHAEL M. BAYLSON

MICHAEL M. BAYLSON, U.S.D.J.